

1 Introduction and purpose

Tuggeranong Valley Rugby Union Sports Club Ltd 098 763 314 and its related bodies corporate (together the “**Vikings Group**”, “**we**”, “**us**” and “**our**”) are committed to complying with the *Privacy Act 1988* (Cth) (**Privacy Act**), the Australian Privacy Principles (**APPs**) and all APP codes binding on us.

2 Scope

This privacy policy (**Policy**) applies to all personal information collected by the Vikings Group as regards:

- (a) members, prospective members, guests, visitors and those that make enquiries about such; and
- (b) any other individual who attends any physical premises occupied by any of the Vikings Group (**Premises**) including:
 - (i) Erindale Vikings, 6 Ricardo St, Wanniasa ACT 2903
 - (ii) Town Centre Vikings, 80 Athllon Dr, Greenway ACT 2900
 - (iii) Chisholm Vikings, 12 Benham St, Chisholm ACT 2905
 - (iv) Lanyon Vikings, Heidelberg St, Conder ACT 2906
 - (v) Badger & Co, The Australian National University, Health & Well-being Centre, 156-11, Joplin Lane, Kambri Precinct, ACT 0200
 - (vi) Vikings Group Head Office, 6 Ricardo St, Wanniasa ACT 2903

3 Your consent for us to collect your sensitive information

By applying to become a member, renewing your membership, making an enquiry as regards such, entering any of our Premises or otherwise providing us with any of the sensitive information specified in the Policy, you consent to that sensitive information being collected, used and disclosed by us in accordance with this Policy.

If you do not wish to provide us with (or for us to collect) any of your sensitive information as specified in this Policy or you withdraw your consent to our future collection, use or disclosure of any of that sensitive information you will be unable to undertake certain activities, such as becoming a member or entering any of our Premises, and/or we will be unable to provide you with certain of our services.

4 The types of personal information we collect about you and purpose(s) for collection

- (a) The terms “personal information” and “sensitive information” have the meanings given to them in the Privacy Act.
- (b) In this Policy, unless otherwise specified, all references to personal information include sensitive information.
- (c) We collect the following types of personal information about you for the noted purposes:

Types of information	Examples of what this might include	Purpose/Use
Personal and contact details	<p>Your name, job title, date of birth, gender, residential address and postal address details, email address, emergency contact details, telephone numbers and information related to responsible gaming or gaming limits.</p> <p>Bank account details, amount of winnings, venue and date and time of such.</p> <p>Where you use the Vikings Rewards App and have opted in for location tracking.</p>	<p>To conduct our business operations, process your membership application or your request to enter our Premises, invoice you for membership or other fees, pay you your winnings, communicate with you, provide you with the information requested, monitoring your gaming and/or about our services and comply with our legal obligations (including responsible gaming and service of alcohol) and for any other purpose permitted or required by law.</p> <p>To market our services to you including access to rewards and promotions when using the Vikings Rewards App.</p>
Identity information/proof of identity	Your name, age or date of birth, contact details (including address, email address, phone number or mobile phone number), occupation, driver's licence or passport number;	<p>To confirm your eligibility to become a member, enter our Premises and to comply with our regulatory obligations including for 'Know your Customer' under anti-money laundering, responsible gaming and service of alcohol, gaming legislation and applicable codes.</p> <p>To make payments to you of your winnings.</p>
Sensitive information (including CCTV surveillance)	<p>CCTV images, images of your face (including face prints) for facial recognition at our Premises.</p> <p>Copies of your identity documentation where required by law, otherwise details of the type of ID</p>	Verifying if you are an excluded person, or other person we are legally entitled to deny entry to, investigate complaints, compliance with applicable laws including to prevent money laundering, other illegal or anti-social

Types of information	Examples of what this might include	Purpose/Use
	<p>shown and key details from it, such as your driver's licence number.</p> <p>Your health information where such is required in order to best assist you to use our services and/or while you are on our Premises.</p> <p>Our observations as to and information relating to your behaviour, including gaming behaviour, conversations with us, amounts spent and consumption of alcohol.</p> <p>Footage of and information in relation to any incidents that occur on Premises that involve you or to which you are a witness.</p>	<p>activities and otherwise as required or authorised by law.</p> <p>To assist us to provide to you the best services and best experience when on our Premises and to improve our services for you.</p> <p>To meet our legal, code and policy obligations for responsible gaming and service of alcohol.</p> <p>For any other purposes permitted or required by law.</p>
<p>Other information as reasonably necessary for us to carry our business operations, provide our services to you and information required or authorised by the law for us to collect.</p>	<p>The times when you attend our Premises, what you spend, on what and what activities you are involved in on Premises.</p>	<p>To improve our services and product offerings.</p> <p>For any other purposes permitted by law.</p>

5 How and from who we collect your personal information

Except as expressly noted in this Policy or as authorised or required by law, where practical Vikings Group collects your personal information directly from you.

We mainly collect your personal information from you when you apply to become a member, wish to enter our Premises as a guest or visitor, use our Vikings Rewards App and/or where you complete and submit any form (whether in hard copy or online) or reply to our request for personal information.

In addition, when you are on any of our Premises you will be monitored by CCTV including for the purposes of responsible gaming and service of alcohol and we may capture images of your face to check and confirm whether you are an excluded person (where required to do so by law), otherwise a person we are legally entitled to deny entry to or to identify you with respect to any potential illegal activity on our Premises including money laundering, anti-social behaviour or other illegal conduct.

If we need to further investigate any possible illegal activity or conduct occurring on our Premises or related to us we may also obtain personal information about you from other sources including the police, other Government authorities, private investigators and/or witnesses in relation to such investigation.

6 Disclosure of your personal information

The purposes of collecting your personal information are outlined in Section 4(c) above. To assist us with undertaking our business, providing our services to you, improving our services and for the purposes noted below, your personal information may be disclosed to the following types of organisations:

Who we may share your information with	Why/for what purpose
Other members of the Vikings Group and our related entities (other than the primary club you applied to become a member of or at which you were a guest or visitor).	To assist with your member application, request to enter our Premises, provision of our services, to comply with our legal obligations and to improve our services and business practices.
Consultants and professional advisors, including solicitors, law enforcement or accountants.	For the purposes of obtaining their professional services, such as to improve the efficiency or quality of our services or any other aspect of our business operations, to assess our legal obligations and to assist us to ensure our compliance with all of our regulatory requirements.
Contractors or temporary staff including to handle workloads during peak periods.	To provide our services to you, conduct our business and/or provide administrative support to us.
Mailing houses.	To communicate with you, provide services updates, renewal of your membership or other administrative communications and, unless you have opted-out, direct marketing of services and/or products we believe will be of interest to you.
Information technology service and gaming machine providers.	To assist us with the conduct of our business and for the purposes noted in Section 4(c) including maintenance of all ICT assets including gaming machines.
Government and regulatory authorities and/or as required or authorised by law.	To try to prevent, identify, investigate or prosecute money laundering, fraud and other misconduct or illegal activity, to resolve any complaints, to satisfactorily respond to any government or regulatory authority inquiries, otherwise satisfy our legal obligations and to comply with responsible gaming and service of alcohol codes, policies and requirements.

7 Disclosure of your personal information outside of Australia

Although unlikely, some of the disclosures noted in Section 6 above may be to third parties outside Australia in the United States, United Kingdom, Ireland, Canada, India or the Philippines to assist us to process your personal information for the purposes noted in Section 6.

8 Direct marketing

As part of our services we will, from time to time, use your personal information to provide you with personalised direct marketing in respect of our services, products, updates and other information we consider may be of interest to you.

You may opt-out of receiving our direct marketing communications at any time. In all our direct marketing communications we will provide a prominent statement about how an individual can elect not to receive direct marketing (i.e. opt-out).

However, even if you choose to opt-out of direct marketing communications you will continue to receive service-related and other non-direct marketing communications from us.

9 Security of your personal information

We take reasonable steps to protect your personal information that Vikings Group holds from misuse, interference and loss and from unauthorised access, modification or disclosure.

10 Access to your personal information

You may request access to your personal information that we hold via our contact details below. We will not charge you for requesting access to your personal information but we may charge you a reasonable fee for completing your request (i.e. providing your personal information to you). We will inform you of any such charges before incurring them.

We will need you to verify your identity prior to disclosing any of your personal information to you. Also, we may refuse your request to access to your personal information that we hold where providing you access would be unlawful, pose a serious threat to the health and safety of any individual, if there is reason to suspect unlawful activity or misconduct or for any other reason allowed by law.

When we receive your request for access we will respond within 30 days from the later of the receipt of your request and you verifying your identity. If we do not provide you access to your information we will provide you with written reasons setting out why we believe we do not need to (or cannot) provide you with the requested access.

11 Correction of your personal information

We rely on you to help us to ensure that your personal information is accurate, up-to-date and complete so please inform us if the information you have previously provided to us changes or is no longer up-to-date. We will not charge you for requesting correction of your personal information.

If we hold your personal information and become aware that the information is inaccurate, out of date, incomplete, irrelevant or misleading or we receive a request from you via our contact details below to correct that information we will take reasonable steps to correct that information.

When we receive a request from you for correction of your personal information, once you verify your identity we will respond to you within 30 days.

12 Our Websites

Vikings Group manages websites that provide links to third party websites. The use of personal information by third party websites is not within our control. Vikings Group is not responsible for the conduct of third-party website owners.

Our websites use cookies to provide you with an improved user experience. Cookies allow us to identify users' browser while they are using the websites.

Our cookies do not identify a user's personal information, meaning we do not link (i.e. combine) the information stored in cookies to any of your personal information we may hold. If you do not wish to allow the use of cookies you can adjust your web browser settings to disable (i.e. block) them.

13 Enquiries, complaints and how to contact us

Any enquiry as regards how we handle your personal information or complaint about our alleged breach of this Policy, the Privacy Act or the APPs should be in writing and sent to the Privacy Officer, Vikings Group at Privacy@vikings.com.au. We will endeavour to acknowledge a complaint on receipt. A decision on your complaint will usually be reached within 30 days and we will notify you of our decision and any steps we will take as a result of that decision.

Our contact details for access and correction requests and/or privacy complaints and enquiries are:

Vikings Group Privacy Officer

Vikings Group Head Office, 6 Ricardo St, Wanniassa ACT 2903

p: 02 6209 5506

e: Privacy@vikings.com.au

If you are unhappy about the outcome of your access or correction request or how we have handled your complaint you may contact the Office of the Australian Information Commissioner (**OAIC**) via the OAIC website or by telephone on 1300 363 992.

14 Changes to this policy

It may be necessary to update and/or change this Policy from time to time to reflect changes to our services or our handling of your personal information. In such cases we will post a revised version of this Policy on our website.

In the case of significant changes to this Policy (or our personal information handling practices) we will notify all affected individuals by email or other relevant methods of contact. After such notification your continued use of our services, entry into any of our Premises or provision of any further personal information to us will be considered your acceptance of such changes and, as regards our collection of any of your sensitive information specified in the revised Policy, your consent to our collection, use and disclosure of that sensitive information in accordance with that revised Policy.

This privacy policy was last updated on 8 May 2024.